1			
2	LESLIE MARK STOVALL, ESQ. Nevada Bar No. 2566 ROSS MOYNIHAN, ESQ. Nevada Bar No. 11848 STOVALL & ASSOCIATES		
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4			
5	2301 Palomino Lane Las Vegas, NV 89107		
6	Telephone: (702) 258-3034		
7	E-service: court@lesstovall.com Attorney for Plaintiff		
8			
9	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
10			
11	KATHRYN MAYORGA, an individual)		
12) 2:19-cv-00168-JAD-DJA Plaintiff,		
13	vs.		
14	CRISTIANO RONALDO, individually,) Does I-XX and Roe Corporations I-XX;)		
15	Defendants.		
16			
17	STIPULATION TO EXTEND THE TIME FOR LESLIE MARK STOVALL ESQ. TO		
18	FILE MOTION TO STAY AND TO EXTEND THE AUTOMATIC STAY PROVIDED (FIRST REQUEST)		
19	The parties through their respective counsel hereby stipulate to extend the time for Leslie		
20			
21	Mark Stovall, Esq. to file a motion to stay execution of judgment pursuant to Rule 62(a) and to		
22	extend the automatic stay provided by Rule 62(a) to April 13, 2023. This is the first extension		
23	requested.		
24	The reasons for this extension request are: Plaintiff's counsel returned to his office from		
25	vacation on February 14, 2023 to prepare for trial of <i>Bailey v. Crockett</i> , Case A-20-816577-C		
26	and <i>Diaz v. Wolf</i> , Case A-20-818587-C in the Clark County District Court and to transition the		
27			
28	files and staff of attorney Mark Braun, Esq. who was retiring and leaving Stovall and Associates Page 1 of 2		
	Tage FOLZ		

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1	as of March 3, 2023. At calendar call, the <i>Bailey v. Crockett</i> case was set to commence trial on		
2	March 13, 2023 and the Diaz v. Wolfe case was continued to the May 2023 stack. On March 10,		
3	2023, the court notified counsel's office that the trial of the <i>Bailey</i> case was continued to April		
5	11, 2023. The review and reassignment of Mr. Braun's files and staff and preparation for the		
6	Bailey and Diaz trials prevented plaintiff's counsel from completing the motion for stay		
7	execution of judgment pending appeal prior to the running the thirty (30) day time limit of Rule		
8	62(a). For these reasons good cause exists to extend the time for filing the motion to stay		
9	02(a). For these reasons good cause exists to extend the time for ming the motion to stay		
10	execution of judgment pursuant to Rule 62(a) and to extend the automatic stay provided by Rule		
11	62(a) to April 13, 2023.		
12	Dated this 16 th day of March, 2023	Dated this 16 th day of March, 2023.	
13	STOVALL AND ASSOCIATES	CHRISTIANSEN TRIAL LAWYERS	
14	/s/Leslie Mark Stovall	/s/Kendelee Works	
15	LESLIE MARK STOVALL, ESQ. Stovall & Associates	PETER S. CHRISTIANSEN, ESQ. KENDELEE LEASCHER WORKS, ESQ.	
16	2301 Palomino Lane	Christiansen Trial Lawyers	
17	Las Vegas, NV 89107	710 South 7th Street, Suite B	
18	(702) 258 3034	Las Vegas, NV 89101	
19	ORDER		
20	IT IS SO ORDERED this 20th day of March 2023.		
21		XXXX.	
22		HS Division of the second	
23	U.S. District Court Judge		
24	Respectfully Submitted:		
25	/s/Leslie Mark Stovall		
26	LESLIE MARK STOVALL, ESQ. Stovall & Associates		
27	2301 Palomino Lane		
	Las Vegas, NV 89107 (702) 258 3034		
28	Fav: (702) 258 0003	Page 2 of 2	